

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications
and Energy on its own Motion to Implement the
Requirements of the Federal Communications
Commission's Triennial Review Order Regarding
Switching for Mass Market Customers

D.T.E. 03-60

**MCI's FIRST SET OF INFORMATION REQUESTS TO
VERIZON MASSACHUSETTS**

WorldCom, Inc. ("MCI") hereby submits to Verizon-Massachusetts ("Verizon") the following information requests. MCI requests responses in accordance with the Procedural Order Memorandum and Ground Rules issued by the Department in this docket.

INSTRUCTIONS

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to a Verizon response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Information Requests

MCI-VZ-1 Does Verizon have logs or other records documenting the time required by its employees to complete all or some of the tasks associated with either the individual hot cut process or the bulk hot cut process? If yes, in what form does Verizon maintain such records (e.g. electronically, on paper)? In addition, please list each task for which completion time is logged. Please provide such records, organized by the CO location in which the recorded work occurred. Please also provide any documentation that contains descriptions or instructions concerning these logs or records.

MCI-VZ-2 Has Verizon deployed or does it have plans to deploy any "Auto MDF (Robotic Controlled Cross Connection)" devices in Massachusetts? If yes, with respect to each "Auto MDF (Robotic Controlled Cross Connection)" device deployed or planned to be deployed, please provide the following information:

- a. the manufacturer, make, model and configuration
- b. all engineering documentation evaluating the equipment prior to its selection.
- c. all documentation relating to the equipment, including documentation provided by access to a secured web site, provided by the equipment vendor, including, but not limited to. Documents relating to equipment installation, operation, expansion, and maintenance of the Robotic MDF referenced in the response.
- d. any analysis, including, but not limited to, cost/benefit analysis, labor savings analysis, payback analysis, present value analysis and any internal rate of return and any other business or financial analysis, associated with the selection, budgeting, purchase, installation and operation of the Robotic MDF.
- e. all training materials related or associated with the Robotic MDFs.
- f. the network plan for additional installations in 2004, and for installations in 2005.
- g. If the answer to the introductory part of this request is no, please provide the information requested in (a) through (f) for each state where Verizon has deployed this device.

MCI-VZ-3 Please confirm that the calculations included in the Hot Cut Panel Testimony, Exhibit IV-A (proprietary), are based on Verizon's current estimate of the

hot cut volumes that Verizon will have to process in each of the four periods to convert the embedded base while keeping up with day-to-day migration activity. Please provide a spreadsheet containing Verizon's estimate of total monthly incremental hot cuts for each of the months. Please populate the spreadsheet utilizing the following heading format:

Month Embedded Base Conversion UNE-P Resale Winback Total

MCI-VZ-4 With respect to Hot Cut Panel Testimony, Cost Model Exhibit III-A, Tab1, Connect Typical Occurrence, column D:

- (a) What instructions were given to the providers of this Connect Typical Occurrence information?
- (b) Please provide copies of all instructions used in the development of Connect Typical Occurrence data.
- (c) What is the source of the entry for APC activity 1?
- (d) What is the source of the entries for RCMAC activities 1,2,3,5 and 7?

MCI-VZ-5 What percentage of Verizon's total working loops in Massachusetts are equipped with NGDLC technology?

MCI-VZ-6 Please provide the following information specific to each wire center in Verizon's Massachusetts service territory:

- (a) total number of active voice grade loops;
- (b) total number of active voice grade loops served by home-run copper;
- (c) total number of active voice grade loops served by digital loop carrier;
- (d) total number of active voice grade loops served by integrated digital loop carrier (as a sub total of c.)
- (e) total number of active voice grade loops served by direct fiber-to-the-premise technology;
- (f) total number of active voice grade loops served by other technologies. Please describe "other technologies" that constitute your response to question f.

MCI-VZ-7 Please provide copies of all Verizon materials, documents or job aids, describing methods and procedures related to the performance of individual or bulk hot cuts and associated number portability, including, but not limited to materials provided to Verizon personnel in the RCCC and RCMAC.

MCI-VZ-8 Please state the maximum number of additional employees per month that Verizon will need to dedicate to the hot cut process, based on the Verizon FLM analysis.

MCI-VZ-9 With respect to the Hot Cut Panel Testimony, Cost Model Exhibit III-A, Tab1, Connect Time, column C:

(a) what instructions were given to the providers of the Connect Time information?

(b) please provide copies of all instructions used in the development of Connect Times.

(c) was averaging a part of the Connect Time information development?

(d) what controls were applied to the development of the Connect Time to insure accuracy?

MCI-VZ-10 On page 51, lines 13-15 of the initial Panel testimony on Hot Cuts, the panel states that “substantial efforts were made to convey the importance of the process and the need for unbiased employee response.” Please provide copies of all correspondence, emails, training manuals, notes or any other documentation provided by Verizon’s “Service Cost staff” as part of these efforts.

MCI-VZ-11 Please state the forecasted number of additional employees that Verizon will need, based on the FLM analysis, to handle UNE-L migrations after conversion of the embedded base of UNE-P customers.

MCI-VZ-12 (a) Please provide the average number of CO Frame, RCCC, Field, NMC, and RCMAC personnel presently on the payroll.

(b) Does the FLM calculate the incremental force required over and above the number of employees presently performing these activities?

MCI-VZ-13 Referring to page 72 of the Initial Panel testimony, given the time required to offer jobs internally before adding new hires, what is the average time that it would take to net one additional employee?

MCI-VZ-14 Referring to Exhibit III-A, please confirm that the sources for the times, occurrence percentage, and forward looking adjustments represent information specific to Massachusetts, and that all raw time and percentage occurrence survey input data is limited to data collected from employees in Massachusetts. If not, please provide the data sources utilized.

WorldCom, Inc.

By:_____

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